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May 8, 2025

**BY ECF**

Hon. Marcia M. Henry  
United States Magistrate Judge  
United State District Court  
Eastern District of New York

Re: Adam White v. Sholem Klein, et al., 23-cv-06924 (RER)(MMH)

Your Honor::

I am co-counsel for Plaintiff Adam White.

In this matter, Plaintiff accepted offers of judgment pursuant to Fed.R.Civ.P. Rule 68, which resolved all of the claims in the case except those for attorney's fees, costs, and expenses.

In a March 11, 2025 text-only order, the Court extended the deadline to file any application for attorney's fees, costs, and expenses until 60 days after the Clerk of the Court entered the judgments. The judgments were subsequently entered on March 12, 2025, making the deadline for any attorney's fees, costs, and expenses application May 12, 2025.

I now write to ask that the Court extend the current May 12, 2025 deadline until July 14, 2025. Defendants join in this application.

An error on my part delayed the process of attempting to settle the remaining claims for attorney's fees, costs, and expenses, without intervention from the Court. If the Court grants this application, the parties will be able to continue that process, and either settle on our own, request a settlement conference, or, if necessary, file a formal application for fees, costs, and expenses with the Court.

Thank you for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver